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December 23, 2019

VIA ECF

Honorable Freda L. Wolfson
United States District Court- District of NJ
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street, Court Room 5E
Trenton, NJ 08608

**Re: *In re: Johnson & Johnson Talcum Powder Products Marketing, Sales
Practices and Products Liability Litigation***
MDL No. 2738

Dear Judge Wolfson:

The Johnson & Johnson defendants hereby submit an amended version of the Inventory of Samples Identified Pursuant to the November 1, 2019 Supplement to the Agreed Order entered by this Court on December 2, 2019. This version, attached as Exhibit 1, corrects some inadvertent errors on the original version, updates the inventory to add an additional sample, and indicates the current location of all samples in the inventory.

Thank for your consideration of these matters. Best wishes for the New Year.

Respectfully submitted,

/s/ Susan M. Sharko

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Encl.

cc: All Counsel of Record (via ECF)

**AMENDED INVENTORY OF SAMPLES IDENTIFIED PURSUANT TO THE
NOVEMBER 1, 2019 SUPPLEMENT TO THE AGREED ORDER¹**

Lot No.	Description	Approx. Weight²	Location as of December 2, 2019³	Type
22318RB	Lot of Johnson's Baby Powder ("JBP") that was voluntarily recalled on October 18, 2019	458 g.	PTI Royston	JBP - 22 oz. bottle
		9 g.	Bureau Veritas	
		84 g.	RJ Lee Group	
		624 g.	Johnson & Johnson	JBP - 22 oz. bottle ⁴
H06158-D7	One of the lots of milled talc used for JBP Lot No. 22318RB	85 g.	PTI Royston	Milled talc; pre-shipment
		154 g.	PTI Royston	Milled talc; railcar
		15 g.	Bureau Veritas	Milled talc; pre-shipment
		48 g.	RJ Lee Group	Milled talc; pre-shipment
H06228-D7	One of the lots of milled talc used for JBP Lot No. 22318RB	90 g.	PTI Royston	Milled talc; pre-shipment
		159 g.	PTI Royston	Milled talc; railcar
		15 g.	Bureau Veritas	Milled talc; pre-shipment
		44 g.	RJ Lee Group	Milled talc; pre-shipment
H06148-D7	One of the lots of milled talc used for JBP Lot No. 22318RB	127 g.	PTI Royston	Milled talc; pre-shipment
		184 g.	PTI Royston	Milled talc; railcar
		16 g.	Bureau Veritas	Milled talc; pre-shipment
		44 g.	RJ Lee Group	Milled talc; pre-shipment
H05168-D7	One of the lots of milled talc used for JBP Lot No. 22318RB	132 g.	PTI Royston	Milled talc; pre-shipment
		134 g.	PTI Royston	Milled talc; railcar
		19 g.	Bureau Veritas	Milled talc; pre-shipment
		56 g.	RJ Lee Group	Milled talc; pre-shipment
21118RB	Lot of JBP that used a milled talc lot that was also used for JBP Lot No. 22318RB	478 g.	PTI Royston	JBP - 22 oz. bottle
		77 g.	RJ Lee Group	
21218RB	Lot of JBP that used a milled talc lot that was also used for JBP Lot No. 22318RB	110 g.	PTI Royston	JBP - 9 oz. bottle
		77 g.	RJ Lee Group	
21318RB	Lot of JBP that used a milled talc lot that was also used for JBP Lot No. 22318RB	110 g.	PTI Royston	JBP - 9 oz. bottle
		75 g.	RJ Lee Group	

Lot No.	Description	Approx. Weight ²	Location as of December 2, 2019 ³	Type
21418RB	Lot of JBP that used a milled talc lot that was also used for JBP Lot No. 22318RB	110 g.	PTI Royston	JBP - 9 oz. bottle
		76 g.	RJ Lee Group	
21918RA	Lot of JBP that used a milled talc lot that was also used for JBP Lot No. 22318RB	56 g.	PTI Royston	JBP - 1.5 oz. bottle
		32 g.	RJ Lee Group	
22118RB	Lot of JBP that used a milled talc lot that was also used for JBP Lot No. 22318RB	478 g.	PTI Royston	JBP - 22 oz. bottle
		45 g.	RJ Lee Group	
22218RB	Lot of JBP that used a milled talc lot that was also used for JBP Lot No. 22318RB	478 g.	PTI Royston	JBP - 22 oz. bottle
		49 g.	RJ Lee Group	
22518RB	Lot of JBP that used a milled talc lot that was also used for JBP Lot No. 22318RB	478 g.	PTI Royston	JBP - 22 oz. bottle
		48 g.	RJ Lee Group	
22618RB	Lot of JBP that used a milled talc lot that was also used for JBP Lot No. 22318RB	478 g.	PTI Royston	JBP - 22 oz. bottle
		48 g.	RJ Lee Group	
23018RA	Lot of JBP that used a milled talc lot that was also used for JBP Lot No. 22318RB	56 g.	PTI Royston	JBP - 1.5 oz. bottle
		32 g.	RJ Lee Group	
23118RA	Lot of JBP that used a milled talc lot that was also used for JBP Lot No. 22318RB	56 g.	PTI Royston	JBP - 1.5 oz. bottle
		47 g.	RJ Lee Group	
23218RB	Lot of JBP that used a milled talc lot that was also used for JBP Lot No. 22318RB	110 g.	PTI Royston	JBP - 9 oz. bottle
		76 g.	RJ Lee Group	
23318RA	Lot of JBP that used a milled talc lot that was also used for JBP Lot No. 22318RB	56 g.	PTI Royston	JBP - 1.5 oz. bottle
		47 g.	RJ Lee Group	
23318RB	Lot of JBP that used a milled talc lot that was also used for JBP Lot No. 22318RB	110 g.	PTI Royston	JBP - 9 oz. bottle
		75 g.	RJ Lee Group	
23418RA	Lot of JBP that used a milled talc lot that was also used for JBP Lot No. 22318RB	56 g.	PTI Royston	JBP - 1.5 oz. bottle
		45 g.	RJ Lee Group	
23418RB	Lot of JBP that used a milled talc lot that was also used for JBP Lot No. 22318RB	110 g.	PTI Royston	JBP - 9 oz. bottle
		75 g.	RJ Lee Group	
23518RA	Lot of JBP that used a milled talc lot that was also used for JBP Lot No. 22318RB	56 g.	PTI Royston	JBP - 1.5 oz. bottle
		45 g.	RJ Lee Group	

¹ “Agreed Order” refers to the January 31, 2018 Agreed Order and Stipulation Regarding the Johnson & Johnson Defendants’ Production of Talcum Powder Products and Talc Samples (Dkt. No. 4032). Pursuant to the November 1, 2019 Supplement to the Agreed Order (the “Supplement”) ¶ 2, the J&J defendants shall provide an inventory of Recall Samples. “Recall Samples” is defined in the Supplement as the remaining portions of “samples of Johnson’s® Baby Powder and milled talc relating to the voluntary Recall that have been retained in the ordinary course of business.” *See* Supplement at 1-2.

² Sample weights exclude the amount of powder retained by PTI Royston for legal and investigative purposes.

³ Pursuant to the Supplement ¶ 4, the Recall Samples have been transferred to Alliance Technologies, LLC in Monmouth Junction, New Jersey (“Alliance”).

⁴ Pursuant to § 702(b) of the Federal Food, Drug, and Cosmetic Act, the J&J defendants received a full, unopened bottle of JBP on October 24, 2019. Although not within the scope of Recall Samples, the J&J defendants will transfer this bottle to Alliance.